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January 12, 2024

ELECTRONICALLY FILED

The Honorable Diane Gujarati United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: United States v. Shimshon Mandel (22-cr-43-DG-RML)

Dear Judge Gujarati:

I represent the defendant, Shimshon Mandel, in the above-captioned matter. Mr. Mandel's sentencing is currently scheduled for February 13, 2024, and his sentencing submission is due on January 23, 2024. I respectfully submit this letter motion to adjourn Mr. Mandel's sentencing until the week of March 4, 2024, to allow more time to prepare Mr. Mandel's submission in advance of sentencing.

This is Mr. Mandel's third request to adjourn sentencing. The first was granted by the Court at the request of both parties on August 1, 2023. *See* ECF No. 39. The Court granted the second on October 19, 2023, at my request, shortly after Mr. Mandel retained my law firm to represent him for sentencing. *See* ECF No. 50. Moreover, I spoke to AUSA Weintraub this week, who informed me that the Government has no objection to the instant request.

Respectfully submitted,

/s/ Daniel L. Stein

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Cc: Assistant United States Attorney Benjamin Weintraub (via ECF)